

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America

v.

(8) Rongjian LI, (9) Qinliang CHEN, (10) Yanbing
CHEN, and (11) Xiong LIN

Case No. 22-6322-MPK

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 2021 to present in the county of Suffolk and elsewhere in the
 District of Massachusetts, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 1956(h)

Conspiracy to commit money laundering

21 U.S.C. § 846

Conspiracy to distribute and to possess with intent to distribute 5 kilograms
and/or 500 grams or more of cocaine

This criminal complaint is based on these facts:

See attached affidavit of FBI Special Agent Benjamin Wallace

☒ Continued on the attached sheet.

/s/ Benjamin Wallace

Complainant's signature

Benjamin Wallace, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/12/2022City and state: Boston, Massachusetts*Page Kelley*
Judge's signature

Hon. M. Page Kelley, U.S. Chief Magistrate Judge

Printed name and title